

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
RICK MULA
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Rick_Mula@fd.org
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7 Attorney for Charles Richard, Jr.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 CHARLES RICHARD, JR.,
15 Defendant.

Case No. 2:08-cr-00237-GMN-VCF

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Steven Rose, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,
20 Assistant Federal Public Defender, counsel for Charles Richard, Jr., that the Revocation
21 Hearing currently scheduled on September 18, 2024 at 10:00 a.m., be vacated and continued to
22 a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant plans to be out of the district during the scheduled
25 hearing date.

26 2. The petition in this case is predicated in part on a new law violation that is
being litigated in state court. The next court date (for a preliminary hearing) in the state matter

1 is September 19, 2024. Resolution of this matter may depend on the resolution of the state
2 matter.

3 3. Parties have entered negotiations and need the additional time to resolve this
4 matter.

5 4. Defendant is incarcerated.

6 5. Additionally, denial of this request for continuance could result in a
7 miscarriage of justice.

8 This is the first request for a continuance of the revocation hearing.

9 DATED this 5th day of September, 2024.

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11 RENE L. VALLADARES
12 Federal Public Defender

JASON M. FRIERSON
United States Attorney

13 By /s/ Rick Mula

By /s/ Steven Rose

14 RICK MULA
15 Assistant Federal Public Defender

STEVEN ROSE
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHARLES RICHARD, JR.,

7 Defendant.
8

Case No. 2:08-cr-00237-GMN-VCF

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 September 18, 2024 at 10:00 a.m., be vacated and continued to October 23, 2024 at the
12 hour of 9:00 a.m.

13 DATED this 5 day of September, 2024.

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16 UNITED STATES DISTRICT JUDGE
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